

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARCH SPECIALTY INSURANCE)	CASE NO. 1:10-cv-6542
COMPANY,)	
)	
Plaintiff,)	DISTRICT JUDGE: Hon. David H. Coar
vs.)	MAGISTRATE JUDGE: Michael T. Mason
)	
RC2 CORPORATION; THE FIRST)	
YEARS, INC.; LEARNING CURVE)	
BRANDS, INC.; and MUNCHKIN, INC.)	
)	
Defendants)	

**JOINT MOTION FOR AGREED ORDER PURSUANT TO STIPULATION BINDING
MUNCHKIN, INC. TO JUDGMENT DECLARING INSURANCE COVERAGE AS TO
RC2 CORPORATION, THE FIRST YEARS, INC. AND LEARNING CURVE BRANDS,
INC.**

Plaintiff, Arch Specialty Insurance Company (“Arch”) and Munchkin, Inc. (“Munchkin”), by and through their undersigned attorneys, move this Court for an agreed order pursuant to stipulation binding Munchkin to the judgment declaring insurance coverage as to RC2 Corporation, the First Years, Inc., and Learning Curve Brands, Inc. In support thereof, Arch and Munchkin state as follows:

1. Arch and Munchkin have filed a joint stipulation (Document 12) with this Court in which they have both agreed as follows:
 - a. In lieu of answering or otherwise responding to Arch’s complaint, Munchkin shall be included in and bound by the Court’s final judgment rendered in this declaratory relief action;
 - b. Munchkin need take no further action in the above-captioned action, nor otherwise participate in any further proceedings; and

c. As between Arch and Munchkin only, each party shall bear its own costs and attorneys' fees in connection with this Court's final judgment

2. Arch and Munchkin move this Court to enter the agreed order, which is attached hereto as Exhibit A.

WHEREFORE, based on the foregoing, Arch and Munchkin request the Honorable Court enter the attached proposed agreed order and for such other relief as this Court deems just.

Dated: December 27, 2010

ARCH SPECIALTY INSURANCE COMPANY

By: /s/ Timothy F. Jacobs
Timothy F. Jacobs
CLAUSEN MILLER P.C.

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Dated: December 27, 2010

MUNCHKIN, INC.

By: /s/ Bryan K. Clark
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LATHROP & GAGE

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